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DEC 11 1998

FEDERAL COMMUNICATIONS COMMISSION Of Counsel  
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December 11, 1998

Magalie Roman Salas  
Federal Communications Commission  
The Portals  
445 Twelfth Street, S.W.  
Washington, DC 20554

**Attention: Amy Zoslov**

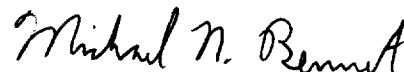
**Re: RT Communications, Inc. Petition for Waiver Pursuant to Section  
20.18(c) of the Commission's Rules; CC Docket No. 94-102**

Dear Ms. Salas:

On behalf of RT Communications, Inc. ("RT") and pursuant to §1.3 of the Federal Communications Commission's ("Commission") rules, we hereby submit the original signature page for RT's Petition for Waiver of the December 31, 1998 deadline ending the suspension of enforcement of Section 20.18(c) of the Commission's rules, as that section relates to the transmission of 911 calls made from TTY devices using digital wireless systems. The original signature page was not available for filing on December 4, 1998. We have attached a date-stamped copy of the submission which bears a facsimile signature as proof of timely filing.

Should you have any questions concerning this matter, please communicate directly with the undersigned.

Sincerely,




Michael R. Bennet

MRB/jmb  
Enclosures

Respectfully submitted,

Advantage Cellular Systems, Inc.

By   
Jerrell Hall  
Cellular-Marketing Manager

December 4, 1998

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

DATE STAMP  
AND RETURN

In the Matter of )  
 )  
Revision of the Commission's Rules )  
To Ensure Compatibility with )  
Enhanced 911 Emergency )  
Calling Systems )

CC Docket No. 94-102

To: Wireless Telecommunications Bureau

RT Communications, Inc., Request for Waiver  
of Section 20.18(c) of the Commission's Rules

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

I. Introduction

RT Communications, Inc. ("RT Communications"), pursuant to § 1.3 of the Rules and regulations of the Federal Communications Commission ("FCC" or "Commission"),<sup>1</sup> hereby requests a limited waiver of the December 31, 1998 deadline ending the suspension of enforcement of Section 20.18(c) of the Commission's Rules, as that section relates to the transmission of 911 calls made from TTY devices using digital wireless systems as set forth in the Commission's November 13, 1998 *Order*.<sup>2</sup>

RT Communications is a small, rural wireless carrier, headquartered in Worland, Wyoming, that will begin operations on February 1, 1999 in Wyoming BTA-69, Wyoming BTA-77, and Wyoming BTA-375. RT Communications is filing this petition in order to not be in violation of the FCC's Rules when it turns up service because it does not anticipate being able to

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<sup>1</sup>47 C.F.R. § 1.3 (1996).

<sup>2</sup>In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Order, RM-8143 (rel. November 13, 1998) ("*Order*").

comply on that date with the requirement of Section 20.18(c) mandating that TTY users be able to access 911 over digital wireless phones.

## **II. Background**

On November 13, 1998, the Wireless Telecommunications Bureau released an *Order* extending through December 31, 1998, the suspension of enforcement of Section 20.18(c) of the Commission's Rules regarding the transmission of 911 calls made from TTY devices using digital wireless systems. While the Commission recognized the difficulties the industry (represented by the Wireless TTY Forum) was experiencing in achieving TTY compatibility with digital systems, the Commission was also concerned about "the significant benefits the requirements established in Section 20.18(c) will provide to individuals who are deaf, hard-of-hearing, or who have speech disabilities" and pushed for an interim solution that included this waiver process in order to continue "the process of achieving carrier compliance."<sup>3</sup> In the *Order*, the Commission established specific procedures under which wireless carriers subject to the requirements of Section 20.18(c) may petition the Commission for a waiver of those requirements. In accordance with these procedures, what follows are the steps RT Communications is taking to provide users of TTY devices with the capability to operate such devices in conjunction with digital wireless phones.

## **III. Compliance Efforts**

RT Communications is currently working with its wireless switch manufacturer, Nortel, on a viable solution to digital 911 for TTY users. Unfortunately, for the time being, it is technically impossible for RT Communications to comply with the Commission's rules

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<sup>3</sup>*Order* at p. 3.

governing TTY access to 911 over its digital wireless system until Nortel makes the appropriate equipment commercially available. While Nortel's equipment is capable of transmitting analog 911 calls, Nortel has yet to develop the equipment necessary to connect with digital wireless handsets and the 911 text message may be corrupted by the consumers' equipment.

Nortel's IS-95 CDMA air interface equipment, in the short term, is incapable of transmitting a 911 call with sufficient error-free text to elicit a proper emergency response. Nortel's IS-136 TDMA air interface equipment is also incapable, in the short term, of transmitting error-free text messages depending upon the type of vocoder used in the system, the type of text message, and the type of handset. In addition, Nortel maintains that industry standards to support TTY operation in digital mode are not currently defined. Nortel has informed RT Communications that Nortel Networks is working with other equipment manufacturers to define the standards needed to make the digital service work. A timely compliance solution depends not only upon Nortel's equipment, but also the makers of TTY equipment. Unfortunately, the only impact RT Communications has on this process is creating a demand for functional 911/TTY equipment.

RT Communications has made quite clear to Nortel the importance of timely compliance with the FCC's rules. However, Nortel has informed RT Communications that it may take as long as twelve to eighteen months to develop a finished product that can accommodate digital TTY use.<sup>4</sup> RT Communications will continue to work with Nortel to develop a system that can work for RT Communications's customers. RT Communications will keep the Commission informed about its progress. If the equipment manufacturers could be more definite about their

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<sup>4</sup>See Order at ¶ 5, footnote 4.

solutions, RT Communications could provide the Commission with a more definite date when it will be capable of transmitting digital TTY signals.

RT Communications will certainly inform any TTY customers of their options concerning public safety network access over RT Communications's network. RT Communications is committed to the safety of its customers who are deaf, hard-of-hearing, or who have speech disabilities and will work with these customers to provide them with any technically feasible telecommunications features or information such as ANI or volume control that will allow these users to access the network. Nevertheless, RT Communications is in the position of transporting and terminating the signal, not in the position of manufacturing the equipment that carries the signal or the end user equipment. RT Communications appreciates the FCC's commitment to solving this industry-wide incompatibility as soon as possible and believes the deadline and subsequent waiver procedure will speed industry compliance. RT Communications is aware of its obligation to file a submission every three months if it is unable to implement digital TTY capability and, if granted this waiver, will keep the FCC informed of the progress it has made with its equipment manufacturers toward making digital 911/TTY a reality.

For the foregoing reasons, RT Communications submits that the limited waiver requested is in the public interest.

Respectfully submitted,

RT Communications, Inc.

By Dee M. Monsen  
Dee Monsen  
Vice President and General Manager

December 4, 1998

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